

EXHIBIT C

From: [Steve I. Silverman](#)
To: [Dorner, Drew T.](#)
Cc: [Micayla Mancuso](#); [Andras, Tiffany M. \(Assoc-Chi-LT\)](#)
Subject: RE: Subpoenas from Zhejiang Huahai Pharmaceutical, Inc. to Summacare Health Plan c/o Summacare Inc. and Connecticare, Inc.
Date: Monday, September 27, 2021 10:41:25 AM

EXTERNAL TO GT

Drew,
We do not agree to transfer the motion.
Steve

Steve I. Silverman | Founding Member
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From: Dorner, Drew T. [mailto:DTDorner@duanemorris.com]
Sent: Monday, September 27, 2021 11:36 AM
To: Steve I. Silverman <SSILVERMAN@klugerkaplan.com>
Cc: Micayla Mancuso <mmancuso@klugerkaplan.com>; andrast@gtlaw.com
Subject: RE: Subpoenas from Zhejiang Huahai Pharmaceutical, Inc. to Summacare Health Plan c/o Summacare Inc. and Connecticare, Inc.

EXTERNAL OF KLUGER KAPLAN

Steve:

I received your FedEx today, and have forwarded it on to Ms. Andras as well. While we disagree with your representations regarding last week's brief back-and-forth concerning ConnectiCare's time to respond (which we had hoped would have led to the call we proposed below), I'd like to raise one other matter. You've filed in the District of Connecticut, but given that this subpoena is part of a nationwide MDL, we'd seek your consent to transfer this motion into the MDL. Among other reasons, it would certainly be most economical to have your motion heard within that proceeding. Please advise.

Regards,

Drew T. Dorner
Associate




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From: Steve I. Silverman <SSILVERMAN@klugerkaplan.com>
Sent: Wednesday, September 22, 2021 11:16 AM
To: Dorner, Drew T. <DTDorner@duanemorris.com>
Cc: Micayla Mancuso <mmancuso@klugerkaplan.com>; andrast@gtlaw.com
Subject: RE: Subpoenas from Zhejiang Huahai Pharmaceutical, Inc. to Summacare Health Plan c/o Summacare Inc. and Connecticare, Inc.

We cannot agree to your terms. We will move the court accordingly.



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From: Dorner, Drew T. <DTDorner@duanemorris.com>
Sent: Wednesday, September 22, 2021 11:14 AM
To: Steve I. Silverman <SSILVERMAN@klugerkaplan.com>
Cc: Micayla Mancuso <mmancuso@klugerkaplan.com>; andrast@gtlaw.com
Subject: RE: Subpoenas from Zhejiang Huahai Pharmaceutical, Inc. to Summacare Health Plan c/o Summacare Inc. and Connecticare, Inc.

EXTERNAL OF KLUGER KAPLAN

Steve:

First, allow me to introduce Tiffany Andras of GreenbergTraurig, CC'd here, who will be doing most of the heavy lifting on behalf of the defendants related to this subpoena. You should feel free to deal directly with her on this matter, cc'ing me.

Second, we can agree to give SummaCare & ConnectiCare until October 18, 2021 to produce the documents requested. However, to the extent there are any far-reaching objections or blanket refusals to produce documents, we'll need to get that teed up in short order so that any disputes can be resolved in accordance with the applicable schedule. In light of the tight schedule the Court has put in place, we cannot agree to extend the period for any objections you may want to make on behalf of your client(s). We're hopeful that any disputes can be worked out amicably without needing to involve the court, and would be happy to meet and confer about any that come up.

Lastly, and related, please let Tiffany know if you are available to meet and confer this afternoon or on Friday. We've got a couple of ideas that could help alleviate issues your clients may have with the current scope of the subpoena, even before you go to the trouble of providing any formal objections. I would join if able.

Drew T. Dorner
Associate

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From: Steve I. Silverman <SSILVERMAN@klugerkaplan.com>
Sent: Wednesday, September 22, 2021 9:06 AM
To: Dorner, Drew T. <DTDorner@duanemorris.com>
Cc: Micayla Mancuso <mmancuso@klugerkaplan.com>
Subject: RE: Subpoenas from Zhejiang Huahai Pharmaceutical, Inc. to Summacare Health Plan c/o Summacare Inc. and Connecticare, Inc.

Thank you, I'd like to avoid unnecessary motion practice on this issue (and I don't know much of anything about the case yet).



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From: Dorner, Drew T. <DTDorner@duanemorris.com>
Sent: Wednesday, September 22, 2021 9:03 AM
To: Steve I. Silverman <SSILVERMAN@klugerkaplan.com>
Cc: Micayla Mancuso <mmancuso@klugerkaplan.com>
Subject: RE: Subpoenas from Zhejiang Huahai Pharmaceutical, Inc. to Summacare Health Plan c/o Summacare Inc. and Connecticare, Inc.

EXTERNAL OF KLUGER KAPLAN

Hi Steve:

As you might already know, there are several other firms involved with the joint defense group in the valsartan action referenced in the subpoena. I (and Duane Morris) just served the subpoenas for logistical reasons, but others have done the heavy lifting. Let me check with my colleagues and I'll get back to you as soon as I can.

Drew T. Dorner
Associate

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From: Steve I. Silverman <SSILVERMAN@klugerkaplan.com>
Sent: Wednesday, September 22, 2021 8:56 AM
To: Dorner, Drew T. <DTDorner@duanemorris.com>
Cc: Micayla Mancuso <mmancuso@klugerkaplan.com>
Subject: Subpoenas from Zhejiang Huahai Pharmaceutical, Inc. to Summacare Health Plan c/o Summacare Inc. and Connecticare, Inc.

Good morning Mr. Dorner,
We are in the process of being retained by SummaCare and Connecticare in connection with the subpoenas served on them by you, on behalf of your client Zhejiang Huahai Pharmaceutical, Inc. in the matter of In re Valsartan, Case No. MDL 19-2875, D. NJ. We understand that the Connecticare subpoena was served September 10 and the Summacare subpoena was served September 13, making their responses due September 24 and September 27, respectively. Having just received the subpoenas, we ask for a 20 day extension to respond from the current response date of the SummaCare subpoena, thus making responses due for both entities on Monday October 18, 2021. Please let us know at your earliest convenience so that we may seek relief from the court if we are unable to agree. Thank you for your anticipated cooperation.



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